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Attorneys for Plaintiffs Verint Systems Inc. and Verint Americas Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

VERINT SYSTEMS INC. and VERINT AMERICAS INC.

Plaintiffs,

v.

Defendant.

Red Box Recorders LTD.

TO: Jonathan Kohl, Esq. Senior Vice President, General Counsel, Corporate & Securities and Corporate Secretary Verint Systems Inc. 175 Broadhollow Road Melville, NY 11747

> Deepro Mukerjee, Esq. Alston & Bird LLP 90 Park Avenue 15th Floor New York, NY 10016-1387 Attorneys for defendant RedBox Recorders Ltd.

COUNSEL:

PLEASE TAKE NOTICE that Fox Rothschild LLP, counsel for plaintiffs Verint

Systems Inc. and Verint Americas Inc. (collectively, "Verint" or "plaintiffs"), shall move before

Case No. 1:14-cv-05403-KBF

ECF Case

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the Honorable Katherine B. Forrest, United States District Judge, in the United States District Court for the Southern District of New York, 500 Pearl Street, Room 1950, New York, NY 10007, as soon as counsel may be heard, for an Order pursuant to Rule 1.4 of the Local Rules for the Southern and Eastern Districts of New York granting the withdrawal of Fox Rothschild LLP, as counsel for Verint in the above-referenced litigation, and for such other and further relief as the Court deems just, equitable, and proper.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, counsel for plaintiffs shall rely upon the declaration of Joseph F. Posillico, Esq. of the law firm of Fox Rothschild LLP, and the supporting memorandum of law, with both documents to be filed under seal to permit *in camera* review by the Court and review by Verint personnel, but denying review by defendant.

PLEASE TAKE FURTHER NOTICE that, counsel for plaintiffs will further move this Court for a brief 30-day stay of the litigation so that Verint can engage new counsel to represent them in this matter.

PLEASE TAKE FURTHER NOTICE that, counsel for plaintiffs hereby requests oral argument if this Motion is opposed.

Dated: New York, New York January 17, 2017 Respectfully submitted,

FOX ROTHSCHILD LLP

By: /s/ Ernest E. Badway
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and

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